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**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking Concerning  
Energy Efficiency Rolling Portfolios, Policies,  
Programs, Evaluation, and Related Issues.

Rulemaking 13-11-005  
(Filed: November 14, 2013)

**OPENING COMMENTS OF  
PACIFIC GAS AND ELECTRIC COMPANY (U 39-M)  
ON THE PROPOSED DECISION PROVIDING GUIDANCE  
FOR INITIAL ENERGY EFFICIENCY  
BUSINESS PLAN FILINGS**

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Dated: August 8, 2016

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**I. INTRODUCTION**

Pacific Gas and Electric Company (PG&E) respectfully submits to the California Public Utilities Commission (CPUC or Commission) its Opening Comments on the proposed *Decision Providing Guidance for Initial Energy Efficiency Rolling Portfolio Business Plan Filings*, mailed on July 19, 2016 (PD). The Commission's guidance applies to the program administrators (PAs) who are responsible for meeting California's ambitious goals for Energy Efficiency (EE) and non-program administrators or "third parties" whose program responsibilities will grow. Energy efficiency plays an important role in meeting California's energy needs. The PD must therefore enable energy efficiency PAs to specify and implement energy efficiency that is reliable, affordable, and tailored to address identified resource needs. As the PD contemplates that more market players will play broader roles going forward, PG&E recommends the following revisions to align the PD with this objective:

- The PD's definition of statewide programs should be revised to allow for flexibility through the California Energy Efficiency Coordinating Committee (CAEECC) process;
- The PD should be modified to include a dispute resolution process when consensus is not reached through the CAEECC process;
- The PD should clarify that the 60 percent goal for third party program implementation by 2020 includes third party implementation of statewide programs and indirect program services and is subject to the standards for cost-effectiveness, customer privacy and information security, and competitive procurement applicable to investor-owned utility (IOU) services generally;

- The PD should clarify that IOUs continue to have the flexibility to identify and propose energy savings programs that are needed to fill any reliability, affordability, or resource target need when those services have not emerged under the primary structure of the PD;
- The PD should be revised to allow codes and standards (C&S) advocacy savings that are not at risk of double counting from new baseline policy, such as new construction and Title 20 appliance standards;
- The PD should clarify the cost-effectiveness threshold for 2017;
- The PD should clarify the Commission's adopted baselines in *Table 1 - Adopted Default Baseline Policy for All Sectors*; and
- The PD should clarify that for purposes of tracking and reporting, EM&V administrative expenses should consist of similar cost categories already approved by the Commission for other types of EE Administrative Costs.

## II. DISCUSSION

### A. **The PD's definition of statewide programs should be revised to allow for flexibility through the California Energy Efficiency Coordinating Committee (CAEECC) process.**

The PD requires that program administrators present statewide program approaches and proposed assignments of statewide leads in business plans, to be filed January 15, 2017.<sup>1/</sup> Ordering Paragraph (OP) 7 provides a list of existing programs to be considered statewide in accordance with the definition provided in OP 5. The PD should allow PAs flexibility to fine-tune the inclusion of programs as "statewide," based on Commission-adopted factors, through the CAEECC process. Given that programs in OP 7 may be modified or sunset through the business plan process, PG&E recommends that the list in OP 7 be considered illustrative and that candidate programs in the existing portfolio and newly introduced through business plans, are finalized via the CAEECC process.

In addition, OP 7 has inadvertently categorized some downstream programs as upstream or midstream and should be corrected.

See proposed modifications to Ordering Paragraph (OP) 7 in Appendix A.

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<sup>1/</sup> PD, p. 56.

**B. The PD should be modified to include a dispute resolution process where consensus is not reached through the CAEECC process.**

PG&E shares the hope that through the CAEECC process, PAs, with input from stakeholders, will reach consensus on the right path forward for statewide programs.<sup>2/</sup> That said, the CAEECC is not a mediation or dispute-resolution body and there may be instances where the PAs and CAEECC will not arrive at consensus. For example, the PD clarifies that cost-effectiveness will be evaluated individually by utility area such that costs and benefits would be tested by the IOU on behalf of ratepayers from whom the funds were collected.<sup>3/</sup> Ultimately, PAs are responsible to design, procure, and manage energy efficiency program portfolios that will reliably meet identified energy resource goals at an affordable rate. Since each IOU's ratepayers will bear the burden of funding statewide programs, IOUs have an obligation to reduce, and/or cease, funding for non-performing statewide programs. The PD does not provide a process to address instances where stakeholders fail to reach consensus on the right path forward for statewide programs.

For these reasons, PG&E recommends the PD be modified to include dispute resolution provisions in the following areas:

1. Selection of lead statewide administrators

The PD allows flexibility for PAs to determine the appropriate lead for each statewide-designated program, through discussions at the CAEECC<sup>4/</sup>. If consensus on the appropriate lead administrator for each statewide program cannot be reached via CAEECC, PG&E recommends that prior to filing their business plans, PAs be permitted to request that Commission Staff make a final selection based on past program performance, capacity to manage statewide programs, and prudent stewardship of ratepayer funds.

2. Modifying or sunseting programs

The PD does not specify a process for PAs to resolve potential issues with statewide programs, such as mid-cycle changes that may need to be made to modify programs to improve outcomes relative

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<sup>2/</sup> PD, p. 49.

<sup>3/</sup> PD, p. 50.

<sup>4/</sup> PD, COL 37.

to program objectives or to sunset programs. Therefore, PG&E recommends that the PD be revised to address this issue as follows:

First, the Commission should require additional specificity regarding how the lead administrator's respective program metrics will be reported, tracked and evaluated. D.15-10-028 requires PAs to provide sector-level and program-level metrics in their business and implementation plans, respectively.<sup>5/</sup> PG&E assumes that lead administrators will report on their programs' successes in meeting their objectives according to the metrics they have established. At a minimum, program status and performance will be presented to CAEECC on an annual basis as part of the Tier 2 advice letter filing requirements.<sup>6/</sup> CAEECC meetings would, therefore, be the venue to discuss, and agree upon, program progress, modifications, continuation, and/or closure. PG&E recommends that the PD require the lead administrators' business plans to include the following additional information: (1) identification of the specific metrics by which progress towards objectives may be assessed; and (2) a schedule for reviewing results against performance indicators on a regular recurring basis. Further, during program implementation, the lead PA should propose specific recommendations for program modifications when objectives and results diverge, seeking input from CAEECC.

Second, there may be instances that require modification or sunsetting particular programs based on program performance and the metrics identified above. The PD should be revised to provide that where the CAEECC does not reach consensus with respect to the appropriate actions that need to be taken, PAs are permitted to seek resolution of those issues by Commission Staff.

See Conclusions of Law (COL) [Proposed #1] and OP [Proposed #2] in Appendix A.

**C. The PD should clarify that the 60 percent goal for third party program implementation by 2020 includes third party implementation of statewide programs and indirect energy efficiency program services.**

PG&E supports the Commission's goal of increasing the participation of third parties to design and deliver utility customer-funded EE programs as a means to encourage innovation and produce

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<sup>5/</sup> D.15-10-028, p. 53.

<sup>6/</sup> D.15-10-028, OP 8.

delivery cost savings.<sup>7/</sup> PG&E agrees that the IOUs' role as "determiners of 'need' and portfolio design" is especially important for utility administrators.<sup>8/</sup> Achieving the 60 percent goal or any third-party program implementation goal requires the third-parties to comply with the same performance, cost-effectiveness, competitive procurement and customer privacy and information security requirements applicable to IOU services generally. The IOUs will continue to need to manage and direct the third-parties' compliance with these utility standards through the terms and conditions of third-party contracts as well as through direct oversight and management of the third-parties' performance and compliance under the contracts. The PD should recognize that the goal for third party program implementation is subject to these direct compliance and performance requirements applicable to the IOUs themselves and required to be overseen by the IOUs.<sup>9/</sup>

In addition, in recognition of the IOUs' portfolio design and coordination role, the PD should clarify that statewide programs that also meet the definition of "third party" programs will count towards the 60 percent budget target for third party programs discussed in the PD.<sup>10/</sup> If that were not the case, IOUs may not have remaining budget available to perform their role as portfolio administrators and to offer additional programs that appropriately target portfolio needs. For example, if the budget for statewide programs were considered to be completely separate from the budget for third party programs, then the IOUs' portfolio budgets would be made up as follows: 60% attributed to "third party" programs, approximately 30% for statewide programs, and 4% for EM&V. This would leave approximately 6% for all other activities. PG&E's Local Government Partnership (LGP) programs alone account for approximately 12% of its 2016 budget. There are additional costs associated with other such programs, as well as costs to support the IOUs' role as portfolio designers and administrators.<sup>11/</sup> If the statewide and third party program budgets were considered to be mutually

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<sup>7/</sup> PD, p. 60.

<sup>8/</sup> PD, p. 62

<sup>9/</sup> E.g., PG&E Electric and Gas Rules 27 and 9, regarding customer privacy and information security; Public Utilities Code Section 451 requiring IOU services and costs to be reasonable.

<sup>10/</sup> PD, p. 54, ("One or more statewide implementers, under contract to the lead administrator, should design and deliver the program.")

<sup>11/</sup> PD, pp. 61-62.

exclusive, PG&E would have insufficient funding to support those additional programs and activities.

For the same reasons, the PD should clarify that all competitively bid services that support the delivery of third party and statewide programs should be included in the 60 percent target because they are critical to successful program delivery. For example, IOUs' contracts with software vendors who support the delivery of the Residential Energy Advisor subprogram, as well as multiple technical review firms that support quality assurance and quality control (QA/QC) for all third party and statewide programs should be included in the 60 percent target.

See proposed revisions to OP 9 in Appendix A.

**D. The PD should clarify that IOUs continue to have the flexibility to identify and propose energy efficiency programs that are needed to fill any reliability, affordability, or resource target need when those services have not emerged under the primary structure of the PD.**

The PD highlights the “increasing importance of the utility administrators as portfolio designers”<sup>12/</sup> and notes the importance of careful portfolio planning.<sup>13/</sup> The PD also acknowledges that “[n]o other entity besides the utility will be able to handle this portfolio design role.”<sup>14/</sup> PG&E agrees with the Commission’s perspective on the critical role IOUs play in portfolio design and administration, and requests that the PD is modified to clarify that IOUs, in the role of portfolio administrators, maintain the ability to identify and propose energy efficiency programs that are needed to fill any reliability, affordability, or resource target need and/or gaps in their role as determiners of need and portfolio design.<sup>15/</sup> In certain circumstances, IOUs may need to focus on specific system-level, geographical, customer, or technology issues that could be resolved through targeted program design. For example, IOUs have data that allow them to identify specific geographies to target load reductions at certain substations to mitigate projected overloading conditions. In addition, IOUs may identify a need for energy savings for particular customers, such as dairies, or the existence of pockets of “stranded potential” energy savings where the use of older, inefficient equipment persists. In these cases, IOUs

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<sup>12/</sup> PD, p. 61.

<sup>13/</sup> PD, p. 62.

<sup>14/</sup> PD, p. 62.

<sup>15/</sup> PD, p. 62.



should retain the ability to provide specific guidance on targeted program design opportunities to third party implementers to develop innovative programs.

See Finding of Fact (FOF) [Proposed #1], and OP [Proposed #1] in Appendix A.

**E. The PD should be revised to allow codes and standards advocacy (C&S) savings that are not at risk of double counting from new baseline policy, such as new construction and Title 20 appliance standards.**

PG&E recognizes the potential for double counting savings relative to existing conditions for programmatic activity as well as for C&S advocacy. That said, the risk of double counting relative to C&S exists only for cases where an existing condition default baseline applies. The PD referenced comments filed by ORA and TURN<sup>16/</sup>, suggesting that areas *where an existing conditions baseline policy is in effect*, savings should not be counted toward IOU goals. Double counting C&S savings is not a material risk for programs or projects where a code baseline is used, such as for new construction activity (e.g., the Commercial Savings by Design and Residential New Construction subprograms), upstream and midstream programs, or in most cases, Title 20 appliance standards. PG&E roughly estimates that code advocacy work for new construction accounted for 24%-36% of C&S savings and has virtually no risk for double counting. Additionally, C&S savings for measures offered through upstream and midstream programs account for 6%-8% of C&S savings.

For these reasons, FOF 11 is overly-broad as written because it implies that any utility savings credit relative to C&S advocacy would represent double counting with programmatic activity. Based on the rationale provided in the PD, FOF 11 should be explicitly limited to savings relative to existing conditions for programmatic activity and refrain from the exclusion of C&S advocacy savings for new construction activity, Title 20 appliance standards, and any other programmatic activity that uses Title 24 code as baseline.

See proposed revisions to FOF 11 and COL 15 in Appendix A.

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<sup>16/</sup> See PD, p. 27 noting that “TURN and ORA also argue the utilities should continue their codes and standards advocacy work, because those fruitful efforts will be captured in the amended CEC forecast. However, the savings associated with codes and standards advocacy and adoption would neither be counted as part of the utility goals, nor as part of their verified savings, for areas where an existing conditions baseline policy is in effect.”

**F. The PD should extend the 1.0 TRC requirement for cost effectiveness until Phase 3 of this proceeding.**

The Commission previously required PAs' portfolios to meet a TRC ratio of at least 1.25 without C&S costs and benefits, spillover, and REN and CCA costs and benefits for the 2013-2014 program cycle.<sup>17/</sup> However, based on considerations that existed at the time, the Commission subsequently approved portfolios below the 1.25 TRC threshold in order for IOUs to achieve savings goals above the minimum levels required in the Commission-adopted goals.<sup>18/</sup> Additionally, in D.14-10-046, for program year 2015, the Commission stated its expectation for the IOUs' 2015 portfolios to exceed a 1.0 cost-effectiveness threshold, but did not require IOUs to meet a 1.25 until subsequent years.<sup>19/</sup>

Given the magnitude of the changes contemplated in this proposed decision, and the uncertainty regarding the impact those changes might have on portfolio performance, the Commission should revise the PD to explicitly continue the 1.0 TRC requirement for 2017. The Commission has contemplated addressing cost-effectiveness issues specifically in Phase 3 of R.13-11-005, as well in the Integrated Distributed Energy Resources (IDER) Rulemaking (R.14-10-003). These would be the appropriate fora for the Commission to determine the applicable cost-effectiveness ratios, methods to calculate these ratios, and inputs into cost-effectiveness calculations<sup>20/</sup>, for PA energy efficiency portfolios.

See COL [Proposed #3] and OP [Proposed #3] in Appendix A.

**G. The PD should clarify the Commission's adopted baselines in *Table 1 - Adopted Default Baseline Policy for All Sectors*.**

PG&E commends the Commission for providing added clarity in the PD regarding baseline policy. PG&E recommends that *Table 1 - Adopted Default Baseline Policy for All Sectors (Baseline Table)*<sup>21/</sup> be revised to further clarify the following items.

PG&E recognizes the Commission's position that the legal requirements of AB802 apply only to "existing buildings" and therefore, not necessarily to industrial processes or other non-building loads.

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<sup>17/</sup> D.12-11-015 p. 100.

<sup>18/</sup> D.12-11-015 p. 101.

<sup>19/</sup> D.14-10-046 p. 108.

<sup>20/</sup> For example, PG&E recommends that Phase 3 include a thorough examination of incremental measure cost (IMC) and other cost inputs associated with the Total Resource Cost (TRC) test.

<sup>21/</sup> PD, p. 45.

The PD clarifies baseline policies for behavioral, retrocommissioning, and operational measures installed in Industrial and Agricultural customers' facilities. However, existing building retrofit projects in these same Industrial and Agricultural facilities appear to be excluded from the default existing conditions baseline policy – even if the project is subject to Title 24. For example, an Industrial sector customer who undertakes a Shell and Building System upgrade in an existing building that is subject to Title 24 is shown to require an industry standard practice baseline in the Baseline Table. PG&E recommends that the PD revise the table to more clearly articulate the Commission's intent and align with the legal requirements of AB802.

To ensure clarity of all baseline policies, PG&E recommends revisions to the Baseline Table that include all likely program- and customer-level baseline scenarios, including baseline policies for all non-residential building and “non-building” projects. PG&E proposes that “non-building” projects or measures are those that are neither within, nor associated with, buildings subject to energy code standards, such as Title 24. “Non-building” measures may include agricultural-driven, manufacturing-driven, or industrial-driven loads and processes.

The Baseline Table includes a category titled “Shell and Bldg System Add-On Equipment,” which may be interpreted as one singular category implying all included equipment are added on to existing equipment. PG&E otherwise understands that the Commission proposes that Shell and Building System measures may include but is not required to be Add-on Equipment.<sup>22/</sup> These terms are not otherwise defined in the PD. PG&E requests added clarity to the PD to inform the working group process<sup>23/</sup> for measure-level recommendations for baselines for each category.

See proposed revisions to Baseline Table (Table D-1) in Appendix B.

**H. The PD should clarify that for purposes of tracking and reporting, EM&V administrative expenses should consist of similar cost categories already approved by the Commission for other types of EE Administrative Costs.**

The PD encourages that PAs track and disclose EM&V administrative expenses, and encourages

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<sup>22/</sup> Staff Whitepaper on Energy Efficiency Baselines, Corrected Version April 27, 2016, P. 26.  
<sup>23/</sup> PD, pp. 43-44.

minimizing these costs.<sup>24/</sup> PG&E supports this recommendation.

The PD does not specify what costs constitute EM&V administrative expenses. That said, the Commission has defined “Utility Administrative Costs,” for delivery of EE programs in D.09-09-047 and the Energy Efficiency Policy Manual v.5 (Policy Manual) - *Appendix F: Cost Categories and Related Cap and Targets*.<sup>25/</sup> For purposes of the tracking and reporting contemplated here, the PD should clarify that EM&V administrative expenses include similar cost categories as “Utility Administrative Costs” for delivery of EE programs as set forth in the Policy Manual. As such, examples of EM&V administrative expenses would include facility and IT/telecom costs, conference fees and travel, payroll taxes, clerical labor, and labor for responding to data requests and stakeholder collaboration. Examples of non-administrative EM&V costs would include EM&V project management, travel for EM&V activities, engineering-related activities, study planning, design, and management, and integration of research findings into programs.

See proposed revisions to COL 53.

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<sup>24/</sup> PD, p.70.

<sup>25/</sup> D.09-09-047 *mimeo*, pp. 49-51; Energy Efficiency Policy Manual v.5, pp. 87-93.

### III. CONCLUSION

The final decision should incorporate the changes recommended above to provide better opportunities for all energy efficiency market participants to contribute to the reliable, affordable, and resource-directed energy savings to meet California's short and long term energy needs.

Respectfully Submitted,

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Dated: August 8, 2016

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## Appendix A

### PROPOSED MODIFICATIONS TO FINDINGS OF FACT

#### FOF 11

11. Giving utilities energy savings credit against their goals for codes and standards advocacy and also for programmatic activity in existing buildings would represent double counting of savings credit.

#### FOF [PROPOSED # 1]

The role of utility administrators as portfolio designers is increasingly important. No other entity besides the utility will be able to handle the portfolio design role.

### PROPOSED MODIFICATIONS TO CONCLUSIONS OF LAW

#### COL 15

15. Utilities should not be assigned or receive credit towards energy efficiency savings goals for codes and standards advocacy for areas where an existing conditions default baseline policy is in effect.

#### COL 53

53. The four percent budget for EM&V activities should be allocated 40 percent to the program administrators and 60 percent to Commission staff. Program Administrators should be encouraged to keep their EM&V administrative expenses as low as possible and to track and disclose them publicly as part of the collaborative process. EM&V administrative expenses should consist of similar cost categories as Utility Administrative Costs for delivery of EE programs as defined in D.09-09-047 (pp. 49-51) and the Energy Efficiency Policy Manual v.5 - Appendix F: Cost Categories and Related Cap and Targets.

#### COL [PROPOSED # 1]

If consensus is not reached through the CAEECC process, Program Administrators may request resolution of issues from Commission staff to: (1) select the appropriate lead administrator for each statewide program based on past program performance, capacity to manage statewide programs, and prudent stewardship of ratepayer funds; and (2) resolve issues regarding modifications to, or sunseting of, particular programs.

#### COL [PROPOSED # 2]

IOUs, in the role of portfolio administrators, should have the ability to identify and propose energy efficiency programs that are needed to fill any reliability, affordability, or resource target need and/or gaps (e.g., customer segment, geography, technology etc.) in their role as determiners of need and portfolio design.

#### COL [PROPOSED # 3]

In light of the changes implemented through this decision, it is reasonable to continue to require the PAs' portfolios to meet a 1.0 Total Resource Cost (TRC) ratio for 2017 and to further consider cost-effectiveness issues in Phase 3 of this proceeding.

## **PROPOSED MODIFICATIONS TO ORDERING PARAGRAPHS**

### **OP 7**

7. All upstream and midstream programs ~~The following programs~~ from the existing portfolio, plus new programs proposed in business plans that are market transformation, upstream, or midstream, shall be delivered statewide according to the definition in Ordering Paragraph 5 above. Examples of existing programs include the following: Residential: Plug Load and Appliance Midstream, Heating Ventilation and Air Conditioning (HVAC) Upstream/Midstream, ~~New Construction~~; Commercial: HVAC Upstream/Midstream, ~~Savings by Design~~; Lighting: Primary Lighting, Lighting Innovation, Market Transformation; Financing: ~~New Finance Offerings~~ California Hub for Energy Efficiency Financing (CHEEF) Pilot; Codes and Standards: Building Codes Advocacy, Appliance Standards Advocacy; Emerging Technologies: Technology Development Support, Technology Assessments, Technology Introduction Support; Workforce, Education, and Training: Connections. Some, but not all downstream (at the customer level) approaches are also appropriate for statewide administration. Examples of existing programs include the following: Savings by Design; ~~New Construction~~; Government Partnerships: California Community Colleges, University of California/California State University, State of California, Department of Corrections and Rehabilitation. Marketing, Education, and Outreach: Energy Upgrade California Campaign shall be considered statewide according to the definition in Ordering Paragraph 5.

### **OP 9**

9. For energy efficiency program purposes, the definition of a third-party program shall be as follows: To be designated as “third party,” the program must be proposed, designed, implemented, and delivered by non-utility personnel under contract to a utility program administrator. Statewide programs are also considered to be “third-party” programs to the extent they meet this definition. Third party programs also include competitively bid services that support the delivery of those programs. Third-parties shall comply with the same performance, cost-effectiveness, competitive procurement and customer privacy and information security requirements applicable to IOU services generally. The IOUs will continue to manage and direct the third-parties’ compliance with these utility standards through the terms and conditions of third-party contracts as well as through direct oversight and management of the third-parties’ performance and compliance under the contracts.

### **OP [PROPOSED #1]**

In their role as portfolio administrators, IOUs shall have the ability to identify and propose energy efficiency programs that are needed to fill any reliability, affordability, or resource target need and/or gaps (e.g., customer segment, geography, technology etc.).

### **OP [PROPOSED #2]**

As part of their business plans, lead statewide administrators shall: (1) identify the specific metrics by which progress towards objectives may be assessed; and (2) provide a schedule for reviewing results against performance indicators on a regular recurring basis. During program implementation, the lead PA shall propose specific recommendations for program modifications when objectives and results diverge, seeking input from CAEECC.

### **OP [PROPOSED #3]**

The PAs’ portfolios shall be required to meet a 1.0 Total Resource Costs (TRC) ratio for cost effectiveness in 2017.

## Appendix B

### **Proposed Modifications to Table 1 - Adopted Default Baseline Policy for All Sectors**

Alteration Type	Delivery	Savings Determination	<u>New</u>	Shell & Bldg System <u>and</u> Add-On Equipment	Behavioral, Retro-commissioning, and Operational	Normal Replacement	Accelerated Replacement and Repair Eligible
New Construction, expansions, added load	Any	Any	<u>Code</u>	N/A	N/A	N/A	N/A
Existing buildings, including major alterations	Upstream & Midstream	Any	<u>N/A</u>	Code	N/A	Code	N/A
	Downstream	Calculated	<u>N/A</u>	Existing	Existing	Code	Dual
		Deemed	<u>N/A</u>	Existing	Existing	Code	Dual
		NMEC	<u>N/A</u>	Existing	Existing	Existing, Program Design	Existing
		RCT/ Experimental	<u>N/A</u>	Existing	Existing	Existing	Existing
<del>Industrial Sector</del> Non-building projects	Any	Any	<u>Standard Practice</u>	<del>Industry</del> Standard practice	Existing	<del>Industry</del> Standard practice	Dual

The following is a summary of the proposed modifications to Table 1 as shown above:

- a. PG&E recommends adding a column for “New” as the other columns, if taken literally, only apply to existing buildings or equipment.
- b. PG&E recommends adding “and” between “Shell and Bldg System” and “Add-On Equipment” category description to avoid stakeholders interpreting the category as singularly “Shell and Bldg System Add-On Equipment,” or otherwise define these terms.
- c. PG&E recommends modifying the Alteration Type of the last row (currently “Industrial Sector projects”) to avoid uncertainty of how to handle agricultural sector projects, or Industrial sector building projects. PG&E proposes that “non-building” is used instead. Non-building projects could be defined as “projects or measures that are neither within nor associated with buildings subject to energy code standards, such as Title 24. This includes, but is not limited to, agricultural-driven, manufacturing-driven, or industrial-driven loads and processes.” Alternatively, PG&E requests that the treatment of Agricultural sector projects is otherwise defined more clearly in the table.
- d. PG&E recommends that “standard practice” is used instead of Industry Standard Practice (ISP). Using ISP may be interpreted to imply that a formal ISP study or similar must be performed for any given measure/customer combination to develop a project. PG&E continues to support use of ISP studies, undertaken at PA or Commission staff discretion, when appropriate and cost effective to do so.